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*Counsel for Defendant
Jacobs Entertainment, Inc*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JANE DOE, a minor by and through her
natural parent, GRACE DOE;

Plaintiff,

vs.

CARSON CITY, a consolidated municipality
and a political subdivision of the State of
Nevada; JAYE PHILLIPS, individually;
JACOBS ENTERTAINMENT, INC., a
foreign corporation,

Defendants.

CASE NO.: 3:18-cv-428-LRH-WGC

**DEFENDANT JACOBS
ENTERTAINMENT, INC.'S MOTION
FOR LEAVE TO FILE DOCUMENTS
UNDER SEAL PURSUANT TO
PROTECTIVE ORDER**

L.R. IA 10-5

Pursuant to Local Rules of Court IA 10-5, Defendant Jacobs Entertainment, Inc.
("Jacobs Entertainment") hereby move this court for Leave to File Documents Under Seal and
request that **Exhibits 3, 5, 6, and 7** of the Declaration of Counsel filed in support of this
motion ("Counsel Dec.") be filed under seal.

This Court's order, dated March 27, 2019 approved the parties' stipulation for entry of a
protective order. (ECF No. 41). In accordance with the provisions set forth in the protective
order, Jacobs Entertainment bring this motion seeking leave of Court to file documents under
seal based on good cause and compelling reasons.

1 Attached as **Exhibit 3** to the Counsel Dec. are security incident reports produced by
2 Jacobs Entertainment, which contain confidential and proprietary information with respect to
3 Jacobs Entertainment's security apparatus as well as the private information of third-parties
4 who have not been named in this lawsuit. In accordance with the provisions set forth in the
5 protective order, these records should remain confidential.

6 Attached as **Exhibit 5** to the Counsel Dec. are excerpts from the deposition of Jaye
7 Edward Phillips. This deposition contains discussion of information concerning minor
8 children and should remain confidential.

9 Attached as **Exhibit 6** to the Counsel Dec. are excerpts from the deposition of Grace
10 Doe. The true name of this individual, who is the parent of Jane Doe, a minor, is contained
11 within this deposition and could lead to the identification of Jane Doe, therefore, it should
12 remain confidential.

13 Attached as **Exhibit 7** to the Counsel Dec. are excerpts of the Security Department
14 Policies and Procedures for the Gold Dust West Carson City produced during the course of
15 discovery, which contain confidential and proprietary information with respect to Jacobs
16 Entertainment's security apparatus. In accordance with the provisions set forth in the
17 protective order, these records should remain confidential.

18 DATED this 6th day of November, 2019.

19 HALL JAFFE & CLAYTON, LLP
20

21 By: /s/ Steven T. Jaffe
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JACOBS ENTERTAINMENT, INC.
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CERTIFICATE OF SERVICE

Pursuant to Federal Rules of Civil Procedure 5(b), I hereby certify that on the 6th day of November 2019, I served the **DEFENDANT JACOBS ENTERTAINMENT, INC.’S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL PURSUANT TO PROTECTIVE ORDER** electronically via the Court’s CM/ECF system:

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/s/ Linda P. Daniel

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